

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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March 6, 2024

**BY ECF**

The Honorable Judge Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

SO ORDERED.

Dated: 3/7/24  
New York, New York

/s/ Alvin K. Hellerstein  
Alvin K. Hellerstein  
United States District Judge

**Re: United States v. Morrow-Wu et al  
23 Cr. 90 (AKH)**

Dear Judge Hellerstein:

With the consent of the Pretrial Services Agency, I write to respectfully request that the Court modify the conditions of Mr. Matthew Morrow-Wu's bond to 1) allow him to relocate from his sister Donika Morrow's home in Tennessee to the District of New Jersey, and 2) remove the requirement that his sister act as Third-Party Custodian.

On June 7, 2023, your Honor ordered Mr. Morrow-Wu released to home detention at his sister's residence in Oneida, Tennessee subject to a \$75,000 personal recognizance bond secured by his sister's vehicle, cosigned by two financially responsible persons, Pretrial supervision, travel restricted to the Eastern District of Tennessee and Southern Eastern Districts of New York, residence at his sister's (Donika Morrow) home in Tennessee. On August 1, 2023, your Honor granted Mr. Morrow-Wu's requests to modify the conditions of his bond to allow him to visit New York City for medical appointments and to allow him to stay overnight when visiting New York City. On September 27, 2023, the Court granted permission for Mr. Morrow-Wu to reside with his close friend, Victor Ho, when travelling to New York for medical appointments. In the nine months since his release from custody, Mr. Morrow-Wu has lived with his sister in Tennessee, traveled to New York City for medical appointments, and worked remotely. He has remained compliant with all conditions of his release.

At this time, Mr. Morrow-Wu requests permission to relocate to the District of New Jersey from Tennessee. Undersigned counsel has learned from Mr. Morrow-Wu's sister that she is currently in the process of separating from her husband and needs to be able to leave her home that is owned by her husband. While Ms. Morrow has friends that she can reside with during this transition, they are not able to also accommodate her and her brother. Fortunately, Mr. Morrow-Wu is able to live with his partner and friend, Victor Ho, who resides in Jersey City, New Jersey. As mentioned above, the Court previously permitted Mr. Morrow-Wu to stay with Mr. Ho during his visits to New York for medical appointments. Mr. Ho resides at 24 Rock Street, Jersey City, New Jersey 07306. Pretrial has been provided Mr. Ho's address and contact information and approves this relocation.

Permitting Mr. Morrow-Wu's relocation would allow his sister to navigate her separation while keeping Mr. Morrow-Wu closer to New York City for easier access to his multiple medical

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providers and Court. Mr. Morrow- Wu's other conditions— including home detention, co-signers, , and travel restrictions— would remain as is. Moreover, because Mr. Morrow-Wu works remotely, as verified by Pretrial, he will continue working even upon relocating to New Jersey.

While the Government has yet to provide their position on this request, the Pretrial Services Agency in both the Eastern District of Tennessee and the Southern District of New York consent to this modification.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ \_\_\_\_\_

Zawadi S. Baharanyi

Assistant Federal Defender

(917) 612-2753

cc: AUSA Jerry Fang  
USPSO Shauna McCullough-Walker (EDTN)  
USPSO Ashley Cosme (SDNY)

**SO ORDERED:**

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**HONORABLE ALVIN K. HELLERSTEIN**  
**United States District Judge**